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Attorneys for Defendants
FUNIMATION PRODUCTIONS, LTD. D/B/A
FUNIMATION ENTERTAINMENT AND GEN
FUKUNAGA, INDIVIDUALLY

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NICHOLAS LYON, an individual,
Plaintiff,

v.

FUNIMATION PRODUCTIONS,
LTD., dba FUNIMATION
ENTERTAINMENT; AMERICAN
UNITED MEDIA, LLC, dba IFA
DISTRIBUTION; ROBERT
RODRIGUEZ, as an individual; GEN
FUKUNAGA, as an individual;
GIANT APE MEDIA; BULLET FILM
PRODUCTION COMPANY, L.L.C.,
and DOES 1 through 50,
Defendants.

CASE NO. SACV13-1322 MWF
(AJWx)

**JOINT STIPULATION RE
REQUEST FOR DISMISSAL**

Courtroom 1600, Sixteenth Floor
Judge: Hon. Michael W. Fitzgerald

Plaintiff NICHOLAS LYON (“Plaintiff”), on the one hand, and Defendants FUNIMATION PRODUCTIONS, LTD., d/b/a FUNIMATION ENTERTAINMENT, in its individual capacity and in its capacity as the Managing Member of Bullet Film Production Company, LLC, and GEN FUKUNAGA, as an individual (“Defendants”) (collectively, the “Parties”), by and through their respective counsel of record herein stipulate as follows:

1. WHEREAS, on December 10, 2013, the Court ordered this action stayed pending resolution of the proceedings in the Eastern District of Texas, FUNimation Productions, Ltd. v. SC Films International, Inc., No. 4:13-CV-329 (Docket No. 59) and pending resolution of arbitration entitled In the Matter of the Arbitration between FUNimation Productions Ltd dba FUNimation Entertainment, Claimant, v. SC Films International, Inc., Matthew Joynes, Individually, and Nicholas Lyon, Individually, Respondents, Case No. 50-140-T-000936-13, in the Arbitration

1 Tribunals of the American Arbitration Association (collectively, “Lawsuits”);

2
3 2. WHEREAS, the Parties have entered into a Settlement and Mutual Release
4 Agreement (“Settlement Agreement”) to settle and compromise all of their claims
5 against each other relating to their lawsuits and arbitration and/or the motion picture
6 of the live action film known as “Bullet”; and

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8 3. WHEREAS, the Parties have agreed to bear their own attorneys’ fees and
9 costs arising from the case at bar.

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11 4. WHEREAS, the Parties have agreed pursuant to the Settlement Agreement to
12 dismiss their lawsuits against each other with prejudice.

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14 5. THEREFORE, the Parties respectfully request that the Court order a
15 dismissal of the above captioned case with prejudice as to all parties and as to all
16 claims.

17 Dated: April 22, 2015

KINAGA LAW FIRM

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19 By: /s/ Patricia A. Kinaga

20 PATRICIA A. KINAGA

21 Attorneys for Plaintiff
22 NICHOLAS LYON

23 Dated: April 22, 2015

JONES WALKER, LLP.

24 By: /s/ Lauren J. Harrison

25 LAUREN J. HARRISON

26 Attorneys for Defendant
27 FUNIMATION PRODUCTIONS, LTD.
28 D/B/A FUNIMATION ENTERTAINMENT
AND GEN FUKUNAGA, INDIVIDUALLY